

1 Jean Murrell Adams, Esq. (State Bar No. 138458)
2 Michelle Bumgarner, Esq
3 Nevada Bar No. 10525
4 ADAMS ESQ, A Professional Corporation
5 One East Liberty, Suite 600
6 Reno NV 89501
7 (775) 219-6777 (phone)
8 (775) 924-7200 (fax)
9 mbumgarner@adamsesq.com
10 *Attorney for Plaintiffs*

11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

W.T., a minor, by and through Guardians ad
Litem and individuals, C.P and B.P.,
Plaintiffs,
v.
DOUGLAS COUNTY SCHOOL DISTRICT,
Defendant.

Case No.: 3:21-cv-242-MMD-CLB

**SUPPLEMENTAL JOINT STATUS
MANAGEMENT REPORT**

Date:
Time:
Ctrm.:

TO THE HONORABLE MIRANDA DU, UNITED STATES JUDGE:

Pursuant to Federal Rule of Civil Procedure 26(f) and Local Rule 26-1, Jean Murrell Adams, Esq., and Michelle Bumgarner, Esq., of the ADAMS ESQ law firm, counsel for Plaintiffs W.T., a minor, by and through his Guardian ad Litem, and individuals C.P. and B.P. ("Plaintiff" or "Plaintiffs"); and Paul J. Anderson, Esq., of the law firm of Maupin, Cox & LeGoy, counsel for Defendant Douglas County School District ("DCSD" or "District"), met and conferred telephonically on January 5, 2022 and through subsequent e-mail exchanges to develop this Supplemental Joint Status Management Report which amends the Case Management Report as follows: .

1. CASE STATUS

The parties met and participated in a judicially mandated Settlement Conference on or about November 17, 2021. The parties were unable to reach a settlement, but did agree to limited discovery. Defendant timely responded to Plaintiffs' Request for Production of Documents on or about December 20, 2021. The parties participated in a "meet and confer" on January 5, 2022 to discuss documents Plaintiffs requested and believe to still be outstanding. Plaintiffs agreed to prepare a Supplemental Request for Production to which Defendant will respond. Accordingly, the parties request that the briefing schedule be extended by 60 days as provided below.

2. MOTIONS

There are no pending motions. The following is a list of anticipated motions:

<u>Moving Party</u>	<u>Subject Matter of the Motion</u>
Plaintiffs and Defendant	Motion for Summary Judgment
Plaintiffs and Defendant (if necessary)	Motion to Supplement the Record

The proposed hearing schedule for these motions is set forth below.

<u>Moving Party</u>	<u>Subject Matter of the Motion with Dates</u>
Both Parties	Motion to Supplement the Record – February 15, 2022
Plaintiffs/Defendant's	Cross-Motion(s) for Summary Judgment – March 15, 2022
Defendants/Plaintiffs	Opposition and Reply - April 15, 2022
Plaintiffs/Defendants	Reply – April 29, 2022

All motion papers, oppositions and replies will be filed based on the periods above and in accordance with Local Rules.

3. CASE MANAGEMENT CONFERENCE

The Parties do not anticipate the need for a Case Management Conference at this time but will provide a revised Joint Case Management Report with scheduling changes in the event one is needed.

1 DATED: January 6, 2022

ADAMS ESQ

2
3 By: /s/ Michelle Bumgarner


Michelle Bumgarner

Attorneys for Plaintiff

W.T. and Mr. and Mrs. Phillips

4
5
6
7
8 DATED: 1/6/2022

MAUPIN, COX & LEGOY

9
10 By: /s/ 

Paul J. Anderson, Esq

Attorneys for Defendant

Douglas County School District

11
12
13
14
15
16 IT IS SO ORDERED.

17
18 XXXXXXXXXXXXXXXXXXXXXXX

United States District Judge

Honorable Miranda Du

19
20 
21 UNITED STATES MAGISTRATE JUDGE
22
23
24
25
26
27
28